

Claim 1 recites a method for displaying an image comprising “producing an image contrast in a contrast production member by an influence of the surface charge pattern.” The Examiner contends that substrate 22 corresponds to the claimed contrast production member and that liquid crystal 16 corresponds to the claimed ferroelectric member (Office Action of January 11, 2005, at page 4).

Okada discloses that substrate 22 is made of glass (col. 8, lines 48-49). Since glass is not a ferroelectric material or a pyroelectric material, the claimed polarization inversion pattern as set forth in claim 1 would not be produced on the surface of the glass (substrate 22) disclosed in Okada. In fact, surface charges corresponding to a polarization pattern are never produced on the surface of the glass disclosed in Okada. Accordingly, substrate 22 does not produce the claimed image contrast as set forth in claim 1.

In addition, substrate 22 would be transparent to any incident light. Although terms should be given their broadest reasonable interpretation, the interpretation must be consistent with the interpretation that one skilled in the art would reach. MPEP at 2100-47.

Here, Applicant submits that one skilled in the art would not interpret the mere transmission of incident light by glass as corresponding to the “producing an image contrast.” In fact, the transmission of the incident light by the glass would arguably teach the opposite. Accordingly, one skilled in the art would not interpret the glass substrate as a “contrast producing member” as contended by the Examiner.

Further, there is no disclosure or suggestion that the incident light transmitted through substrate 22 is influenced by any charge associated with the liquid crystal 16. Although a charge

on the liquid crystal may produce an image, the transmission of the image through the substrate itself would not be influenced by any charge. Accordingly, Okada does not disclose or suggest the claimed contrast production member in combination with the other claimed features of claim 1.

Because claims 20 and 39 recite features similar to those given above with respect to claim 1, Applicant submits that claims 20 and 39 are patentable for at least reasons similar to those given above with respect to claim 1.

Applicant submits that claims 7, 10, 13, 15-19, 26, 29, 32, 34-38, 41, 45-48, 51 and 52 are patentable at least by virtue of their respective dependencies.

In addition, Applicant submits that the rejections of claims 18, 19, 37, 38 and 41 are improper since they depend on claims that have allowable subject matter.

With respect to claims 15-17, 34-36 and 45-47 the Examiner cites sections of Okada that, at best, relate to the dispersion of particles in electrodes and alignment films. These sections are unrelated to the liquid crystal, which allegedly corresponds to the claimed ferroelectric member. Accordingly, any teachings related to the dispersion of particles in these sections are irrelevant to the claimed features of the ferroelectric member in the respective claims.

2. Allowable Subject Matter

Applicant thanks the Examiner for finding allowable subject matter in claims 2-6, 8, 9, 11, 12, 14, 21-25, 27, 28, 30, 31, 33, 40, 42-44, 49, 50 and 53-58 and for indicating that these claims would be allowable if rewritten in independent form.

Applicants hold rewriting these claims in abeyance until the subject matter regarding their respective base claims is resolved.

3. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

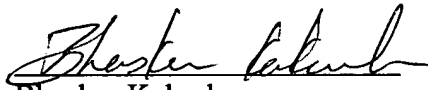
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